

CIVIL RIGHTS SELF-STUDY TRAINING

CIVIL RIGHTS TRAINING FOR CONTRACTING
ENTITIES

PARTICIPANT
GUIDE

Class Purpose

This training assists Contracting Entities in providing the required annual Civil Rights training to all personnel employed, through full or part-time employment, to assist in a federally funded Nutrition Assistance Programs.



TEXAS DEPARTMENT OF AGRICULTURE
COMMISSIONER SID MILLER

Table of Contents

Introduction.....	3
Module 1: Civil Rights and Your Program	5
Concept and Purpose	6
USDA FNS Protected Classes	6
Examples of Unlawful Discrimination	7
Training Your Staff.....	7
Why F&N Requires Civil Rights Training	8
Recommended Training Format	8
Civil Rights Questions and Resources	8
Module 2: Available F&N Nutrition Assistance Programs.....	9
F&N Nutrition Assistance Programs.....	10
Important Point!	11
Module 3: Public Notification	12
Public Notification System Purpose	13
Notification of Media Outlets and the Public	13
“And Justice for All” Posters	13
Module 4: Program Accessibility.....	16
Types of Program Accessibility.....	17
Physical Accessibility	17
Meal Modifications	18
Language Accommodations	18
Self-Evaluation of Services	19
Module 5: Customer Service & Complaints.....	20
Customer Service	21
Complaints	23
Conflict Resolution	23
Module 6: Additional Important Information	25
Data Collection	26
Civil Rights Coordinators	26
Administrative and Site Compliance Reviews.....	26

INTRODUCTION

Modules	Estimated Time
Module 1: Civil Rights and Your Program	10 min
Module 2: Available F&N Nutrition Assistance Programs	5 min
Module 3: Public Notification	10 min
Module 4: Program Accessibility	10 min
Module 5: Customer Service and Complaints	15 min
Module 6: Additional Important Information	10 min
Total Class Time	1 hr

Participant Materials

Participant Guide

Acronyms

USDA – United States Department of Agriculture
 FNS – Food Nutrition Services
 TDA – Texas Department of Agriculture
 F&N – Food and Nutrition
 CE – Contracting Entity
 CACFP – Child and Adult Care Food Program
 NSLP – National School Lunch Program
 SBP – School Breakfast Program
 SFSP – Summer Food Service Program
 FDP – Food Distribution Programs
 TEXCAP – Texas Commodity Assistance Program
 CSFP – Commodity Supplemental Food Program
 SMP – Special Milk Program
 FFVP – Fresh Fruit and Vegetable Program
 SFMNP – Senior Farmer’s Market Nutrition Program

Summary/Overview

According to USDA, Civil Rights training is required annually for all personnel, part-time and full-time, assisting with all Child Nutrition Programs funded through USDA FNS. This training assists Contracting Entities fulfill this requirement and includes all required topics.

Acknowledgment Statement

You understand and acknowledge that:

- the training you are about to take does not cover the entire scope of the program; and that
- you are responsible for knowing and understanding all handbooks, manuals, alerts, notices and guidance, as well as any other forms of communication that provide further guidance, clarification or instruction on operating the program.

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MODULE 1: CIVIL RIGHTS AND YOUR PROGRAM

Topic	Objective
Module 1 Introduction	<ul style="list-style-type: none">○ Participants will be able to analyze their own and other's behaviors to ensure compliance with Civil Rights regulations.
USDA FNS Protected Classes	
Examples of Unlawful Discrimination	
Training Your Staff	
Why F&N Requires Civil Rights Training	
Recommended Training Format	
Civil Rights Questions and Resources	
Total Class Time	10 min



CONCEPT AND PURPOSE

This workbook has been developed to provide CEs operating one or more of USDA's FNS programs administered through TDA's F&N Division, with basic guidance and information on civil rights compliance requirements in the administration of these programs. CEs include entities contracted directly with TDA, school food authorities, sponsored sites and sub-agencies.

This workbook is prepared as a self-study course or a trainer's guide and provides you with the information to meet the basic Civil Rights requirements.

USDA FNS PROTECTED CLASSES

As an administrator of one or more F&N programs, you are responsible for ensuring that everyone has equal access to the program(s) you administer. Federal law prohibits discrimination in program administration based on the following USDA protected classes:

- Race,
- Color,
- National origin,
- Sex,
- Age, or
- Disability.

Discrimination is the treatment or consideration of, or making a distinction in favor or against, a person based on the group, class, or category to which that person belongs. Unlawful discrimination in any form is strictly prohibited whether a program is fully or partially federally funded. Unlawful discrimination can be intentional or unintentional.

CEs MUST strictly adhere to and enforce the provisions of the Civil Rights laws and regulations contained and described in their program handbook. This training is a general overview regarding Civil Rights within F&N programs.

EXAMPLES OF UNLAWFUL DISCRIMINATION

There are different types of discrimination and in Civil Rights unlawful discrimination could be demonstrated by the following:

- Giving one group or type of participants larger or extra helpings of food while not providing the same to other groups or types of participants, i.e., serving boys larger portions than girls.
- Separating genders, i.e., putting the girls separate from the boys.
- Closing programs in areas easily accessible by all groups, i.e., for budget reasons you need to close a service location and select a location that is easily accessed by all program participants while keeping a location that is not easily accessible by some of your program participants. This could include participants who use public transportation, live far away from the location that will stay open, etc.
- Failing to provide children with special needs accommodating meals. Please see your program handbook to determine if this example applies to you and for additional information about providing meals to persons with special needs.
- Failing to provide program information to all potential program participants, i.e., not distributing program information in a language specific to the population of the service area such as Spanish or Vietnamese.

TRAINING YOUR STAFF

You must give civil rights training to all levels of staff, contractors, volunteers, etc., involved in any aspect of the F&N program(s) you operate! This training must be given to all new staff, contractors, volunteers, etc. before they begin any program related duties and annually to all tenured staff, contractors, volunteers, etc.

In addition, you must document your training efforts as part of the documentation and record-keeping requirements. Specifics regarding documentation and record-keeping requirements are available in your program handbook but must include at a minimum:

- Trainer's name,
- Training date,

- Title of training,
- Topics covered,
- Participant's names and
- Participant's signatures.

WHY F&N REQUIRES CIVIL RIGHTS TRAINING

Civil Rights laws were enacted to remedy certain basic inequities in the legal, political and social systems of our nation. In addition, these laws clarify the forms in which Civil Rights violations occur and spell out the penalties and sanctions for failure to provide all affected persons with “Equal justice under the law...”

F&N programs are funded by federal dollars with USDA serving as the “pass-through” agency. Since these dollars are drawn from taxpayers across the nation, taxpayers are entitled to equal use of the programs. In essence, the tax dollars are to be used for the benefit of ALL eligible persons.

RECOMMENDED TRAINING FORMAT

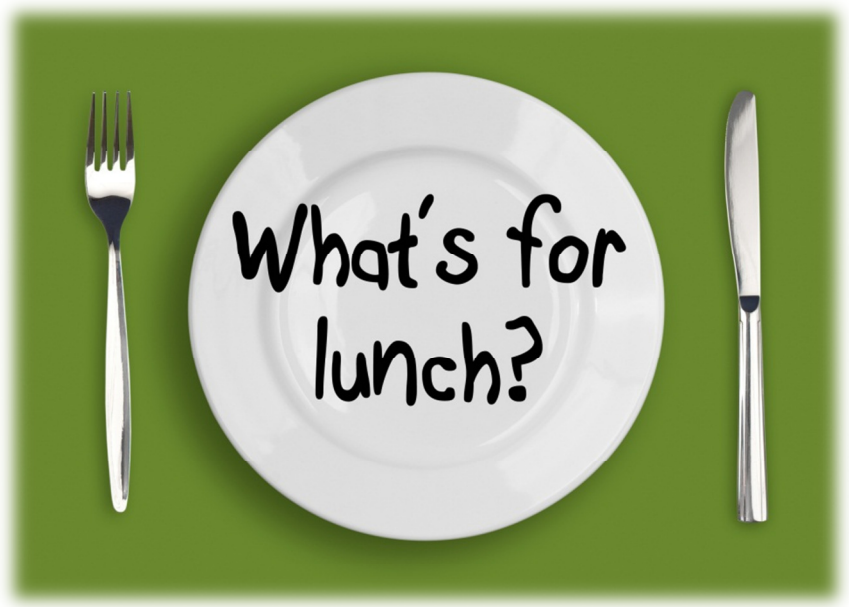
It is highly recommended that you conduct civil rights training as a group process. Facilitation of this material in a group setting increases the likelihood of group discussion and enhanced understanding of the material.

CIVIL RIGHTS QUESTIONS AND RESOURCES

There may be occasions when you are unsure about a certain situation or how a situation relates to your program compliance with civil rights. In these instances, please contact your F&N Community Operations Office, School Operations or Commodity Distribution Specialist.

MODULE 2: AVAILABLE F&N NUTRITION ASSISTANCE PROGRAMS

Topic	Objectives
F&N Assistance Programs	
Important Point!	<ul style="list-style-type: none">○ The learner will be able to identify USDA FNS programs offered by TDA F&N.
Total Class Time	5 min



F&N NUTRITION ASSISTANCE PROGRAMS

There are eleven unique food service programs administered by F&N. F&N contracts with public and private nonprofit organizations to operate nutrition assistance programs. These contracting entities (CE) either operate the program(s) directly or “sponsor” the programs in qualifying sites.

- Child and Adult Care Food Programs (CACFP)

CACFP helps child and adult day care facilities, and family day homes to improve the nutritional quality of the meals they provide to the individuals receiving services at their facilities.

- National School Lunch (NSLP) Program including Seamless Summer

NSLP provides lunch during the school day to children. These programs encourage healthy eating habits and promote meals using locally produced agricultural foods and donated commodities. The Seamless Summer Program option enables schools to continue to operate NSLP during the summer months.

- School Breakfast Programs (SBP)

SBP provides breakfast during the school day to children. SBP operates in the same manner as NSLP.

- Summer Food Service Program (SFSP)

SFSP helps sponsors such as school districts, Boys and Girls Clubs, YMCAs, and summer camps to administer the program and provide food to feeding sites. Feeding sites serve food to children. Community partners help with outreach, volunteers, resources and sports/recreation activities.

- Food Distribution Programs (FDP), Texas Commodity Assistance Program (TEXCAP) and Commodity Supplemental Food Program (CSFP)

A group of programs that provide USDA-donated commodities to low-income individuals and families, public and private schools, summer food service programs, food banks, and soup kitchens.

- Special Milk Program (SMP)

SMP is a federally assisted program providing milk to children in schools and childcare institutions who do not participate in other Federal meal service programs. The program reimburses schools and childcare institutions for milk they serve.

- Fresh Fruit and Vegetable Program (FFVP)

FFVP is a federally assisted program providing free fresh fruits and vegetables to students in participating elementary schools during the school day. The goal of FFVP is to improve children's overall diet and create healthier eating habits to influence their present and future health.

- Senior Farmer's Market Nutrition Program (SFMNP)

The SFMNP program allows qualified participants to purchase nutritious fresh fruits and vegetables using SFMNP vouchers from participating farmers' market associations to improve their diets.

- Food Assistance for Disaster Relief

This program only activates during disasters or emergencies.

These programs are administered in Texas by TDA F&N and play a vital role in providing good nutrition for eligible children and adults.

IMPORTANT POINT!

Because there are a variety of programs and sites that receive this training, not all examples in this workbook apply to all.

If you have questions about the information provided, contact your F&N Community Operations Office, School Operations or Commodity Distribution Specialist. Contact information can be found at <http://www.squaremeals.org/About/ContactFoodandNutrition.aspx>.

MODULE 3: PUBLIC NOTIFICATION

Topic	Objectives
Public Notification System Purpose	<ul style="list-style-type: none"> Participants will be able to prepare appropriate notification for the public and media outlets.
Notification of Media Outlets and the Public	<ul style="list-style-type: none"> Participants will be able to appropriately place “And Justice for All” posters as required by regulation.
“And Justice for All” Posters	<ul style="list-style-type: none"> Participants will be able to design program materials and other items appropriately utilizing the nondiscrimination statement and complaint filing procedures.
Nondiscrimination Statement Uses and Compliant Filing Procedures	
Total Class Time	10 min



PUBLIC NOTIFICATION SYSTEM PURPOSE

According to FNS Instruction 113-1, all programs must include a public notification system. The purpose of this system is to inform applicants, participants, and potentially eligible persons of the program availability, program rights and responsibilities, the policy of nondiscrimination, and the procedure for filing a complaint.

NOTIFICATION OF MEDIA OUTLETS AND THE PUBLIC

Contracting entities (CEs) are required to send out a public announcement to media outlets such as newspapers and radio stations announcing program availability. This notice must include the Nondiscrimination Statement discussed on the next page. CEs are not required to pay any media outlet to print or announce the information distributed.

Once the announcement is distributed to the media, CEs are required to keep a copy of the announcement, record of when it was submitted to the media and the media contact information on file. For CEs participating in CACFP, TDA fulfills this requirement through a press release distributed to all Texas media outlets. Additional information regarding how this requirement affects your specific program is available in your program handbook.

“AND JUSTICE FOR ALL” POSTERS

The poster is a tool to help communicate the services and benefits of your program without discrimination. All CEs must prominently display USDA’s nondiscrimination poster, “And Justice for All,” within their establishments where services and benefits are delivered. CEs participating in NSLP, SBP, SMP and SFSP must also have the poster at each feeding site. CEs participating in the CACFP Day Home Care Program are not required to have the poster.

Only USDA original posters are accepted as approved posters and any reproduction will not be accepted. USDA-approved posters are available from TDA F&N by request through mail at P.O. Box 12847, Austin, TX 78711; electronic mail through squaremeals@TexasAgriculture.gov; contacting your F&N Community Operations Office; or regional Education Service Center (ESC).

NONDISCRIMINATION STATEMENT USES AND COMPLAINT FILING PROCEDURES

USDA has established nondiscrimination statement and complaint filing procedures provided in each program handbook. The statement has two components:

- Nondiscrimination Statement
- Complaint filing procedures

The entire statement reads:

The U.S. Department of Agriculture (USDA) prohibits discrimination against its customers, employees, and applicants for employment on the bases of race, color, national origin, age, disability, sex, gender identity, religion, reprisal and, where applicable, political beliefs, marital status, familial or parental status, sexual orientation, or all or part of an individual's income is derived from any public assistance program, or protected genetic information in employment or in any program or activity conducted or funded by the Department. (Not all prohibited bases will apply to all programs and/or employment activities.)

If you wish to file a Civil Rights program complaint of discrimination, complete the USDA Program Discrimination Complaint Form, found online at http://www.ascr.usda.gov/complaint_filing_cust.html, or at any USDA office, or call (866) 632-9992 to request the form. You may also write a letter containing all of the information requested in the form. Send your completed complaint form or letter to us by mail at U.S. Department of Agriculture, Director, Office of Adjudication, 1400 Independence Avenue, S.W., Washington, D.C. 20250-9410, by fax (202) 690-7442 or email at program.intake@usda.gov.

Individuals who are deaf, hard of hearing, or have speech disabilities and wish to file either an EEO or program complaint please contact USDA through the Federal Relay Service at (800) 877-8339 or (800) 845-6136 (in Spanish).

Persons with disabilities who wish to file a program complaint, please see information above on how to contact us by mail directly or by email. If you require alternative means of communication for program information (e.g., Braille, large print, audiotape, etc.) please contact USDA's TARGET Center at (202) 720-2600 (voice and TDD).

USDA is an equal opportunity provider and employer.

All CEs are required to include these statements, in their entirety, on all program applications and materials regarding benefits and services. Examples of items requiring each statement would include, but are not limited to:

- Eligibility or program participation applications,
- Promotional literature,
- Websites and
- Menus.

If the material is too small to permit the full statement to be included, the material will at a minimum include the statement, in print size no smaller than the text that “This institution is an equal opportunity provider.”

In addition, recognizing that Internet, radio, and television public service announcements are generally short in duration, the nondiscrimination statement does not have to be read in its entirety. Rather, a statement such as “The [program name] is an equal opportunity provider” is sufficient to meet the nondiscrimination requirement.

Certain items are exempt from the nondiscrimination statement and complaint filing procedures due to the lack of available printing space. Should printing space be available, this exemption does not apply. Examples of such items includes, but is not limited to:

- Cups,
- Buttons,
- Magnets and
- Pens.

Important Note: Be certain when using human likenesses on any program related materials, reasonable efforts are made to ensure racial, ethnic and disability balance.

MODULE 4: PROGRAM ACCESSIBILITY

Topic
Types of Program Accessibility
Physical Accessibility
Meal Modifications
Language Accommodations
Self-Evaluation of Services
Total Class Time

Objectives

- Participants will be able to evaluate and improve program accessibility as needed to ensure services are provided in accordance to regulations.



TYPES OF PROGRAM ACCESSIBILITY

Program accessibility is a multi-faceted topic. Accessibility to the program can include physical access to the services provided, meal modifications (if your program provides meals) and language accommodations. All locations where USDA FNS services are provided must be in compliance with all civil rights requirements as outlined in FNS Instruction 113-1 and the appropriate program handbook.

PHYSICAL ACCESSIBILITY

F&N Programs that are fully or partially funded through federal dollars must be accessible to and useable by persons with disabilities, including persons with vision or hearing impairments. CEs are required to ensure physical access to buildings and parts of buildings housing these programs. If access is not available, CEs must then offer the most integrated setting possible to enable persons with disabilities to fully benefit from these programs. When building structural changes are necessary, a transition plan should be developed to ensure program accessibility. Access accommodations may include, but are not limited to:

- Moving to accessible buildings,
- Assigning aides to assist participants,
- Making home visits,
- Delivering services at alternative accessible sites (for sites with fifteen or fewer employees),
- Redesigning equipment,
- Changing the schedule of service hours,
- Altering existing facilities, and
- Constructing new, accessible facilities.

If services cannot be provided because of structural barriers, the CE must:

- Inform the person with disabilities of alternative sites where they can receive services and
- Pay all or part of any additional cost the person with disabilities incurs as a result of being transported to the alternate site. Sometimes paying such costs is not required, contact your F&N

Community Operations Office, School Operations or Commodity Distribution Specialist for additional information.

MEAL MODIFICATIONS

Appropriate CEs, serving breakfast, lunch, snacks and/or supper, are required to serve special meals without additional charge to persons with disabilities with diet restrictions. Programs that provide meals have the additional requirement to ensure meal modifications for persons with disabilities. Modifications can include, but are not limited to:

- Changing the texture of the food served, i.e., the menu has carrots for lunch and a program participant cannot eat solid carrots so you mash the carrots to that participant.
- Serving an alternative selection that meets the meal guide requirements, i.e., a program participant is lactose intolerant and cannot drink fluid milk so you serve fluid soymilk to that participant.

Please refer to your program handbook for additional information regarding meal modification accommodations. If you are unable to find information related to your specific situation, you may contact your Regional F&N Community Operations Office, School Operations or Community Distribution Specialist.

LANGUAGE ACCOMMODATIONS

For generations the United States of America (USA) has been referred to as a great melting pot. This referral is specific to the large diversity of our country's citizens. Many people immigrate to the USA either unable or have very limited ability to speak, read, write and/or understand English.

To ensure compliance with Civil Rights laws, CEs are required to provide all program materials to potentially eligible persons, applicants, program participants and the public in languages other than English, as appropriate. Additional information regarding this requirement is available in your program handbook. If you are unable to find information related to your specific situation, you may contact your Regional F&N Community Operations Office, School Operations or Community Distribution Specialist.

SELF-EVALUATION OF SERVICES

With the help of persons with disabilities or similar advocacy organizations, evaluation of the quality and availability of services and the correction of inequitable policies or practices is required. Evaluations of services should include assessment on such questions as:

- Can a person with disabilities get to the facility with reasonable ease?
- If the person can reach the location, can they enter the facility and access the specific location where services are provided?
- If they can access the location where services are provided, is there an accessible restroom?
- If they can access the location where services are provided, are necessary accommodations made for their particular disability?
- If meals are served, are meal modifications available?
- If an applicant, program participant or large population of limited English proficiency persons are predominant in the community, are language accommodations available?

The results must be maintained in accordance with appropriate program recordkeeping requirements and must include:

- A list of interested persons consulted,
- A description of the areas examined and the programs identified, and
- A description of the completed modifications.

MODULE 5: CUSTOMER SERVICE & COMPLAINTS

Topic	Objectives
Customer Service	<ul style="list-style-type: none">○ Participants will be able to utilize and combine customer service and conflict resolution skills to provide exemplary service to program participants and mitigate complaints to the greatest extent possible.
Complaints	
Conflict Resolution	
Total Class Time	15 min



CUSTOMER SERVICE

Ensuring customer service delivery is the best possible, CEs should have standard policies regarding customer service and employees are applying rules, policies and procedures consistently and equitably.

Customer Service is:

- Effectively communicating with customers;
- Responding to their needs;
- Valuing their worth; and
- Instilling excellence through courtesy, Confidence and Enthusiasm.

Applicants, participants and the public are customers of your program. Anyone dealing directly with customers occupies a position of trust with respect and dignity as the foundations of building and maintaining trust and excellent customer service.

Why is this important to you? Treating customers with respect and dignity through excellent customer service saves you time and minimizes opportunities for complaints and angry customers as well as saves your agency money and staff resources. To ensure you provide excellent customer service, some best practices include:

- Treating all customers with respect and dignity,
- Exercising good listening skills by being attentive to the customer and their needs,
- Learning to empathize with the customer when necessary,
- Responding to questions in a non-threatening manner ensuring your voice and tone are calm and clear,
- Communicating rules as well as client rights and responsibilities clearly and precisely,
- Recognizing and appreciating that customers have many varied needs and few resources, and
- Recognizing when a person feels that they have been treated in a rude and discourteous manner.

As a professional, you must respond in a professional manner regardless of the customer's behavior. No matter what happens, try to avoid:

- Hastily and/or unnecessarily passing a complainant to a coworker. If at all possible, actively listen to the customer and assist with their concern or issue. Only pass the customer to someone else when you have exhausted all available resources at your disposal.
- Totally ignoring a complainant while they “talk themselves out and calm down.”
- Placing a complaint caller on hold or leaving a complainant in a waiting room and returning every 5 minutes or so without offering assistance or an update on the person and/or information for whom/what they are waiting.
- Or, stating to the complainant, “Sorry, it’s not my job!”

Instead, try to:

- Avoid interrupting the customer. Be patient and give the customer the opportunity to explain the issue.
- Be understanding. Of all the communications situations that you encounter, angry customers require the most empathy. Remember, don’t be judgmental.
- Talk calmly and slowly, in a well-modulated voice and low pitch. This should help relax the customer and allow you to address the facts, not cater to the emotions.
- Apologize. Even if the problem is not the fault of your organization and clearly not your fault, apologize to the customer for his/her inconvenience.
- Identify the problem based on the information the customer gives you. Then determine a solution. Depending on the specifics of the conversation and your knowledge of your organization, the solution may involve contacting the customer again.
- Personally follow up with the customer to make sure that the customer has been satisfied and the issue is resolved.

Remember the golden rule when working with customers, “Do unto others as you would have done unto you.”

COMPLAINTS

Despite providing excellent customer services, occasionally there will be a customer who believes their Civil Rights have been violated. A Civil Rights complaint alleges some kind of discrimination or adverse action that pertains to the protected classes as identified in Module 1.

CEs are required to have procedures in place to move the complaint into the appropriate process for handling Civil Rights complaints. CEs are not authorized to process a Civil Rights complaint. All associated staff must be able to provide written documentation regarding complaint procedures and an explanation of the complaint process. Additional information regarding appropriate handling of a Civil Rights is outlined within your program handbook.

A person alleging discrimination has the right to file their complaint within 180 days of the alleged action. Complaints may be received, and must be accepted, either in writing or verbally and must be processed according to USDA FNS and TDA established timelines as outlined in your program handbook. All complaints must be kept confidential and the resolution of complaints is always encouraged at the lowest possible level.

CONFLICT RESOLUTION

In no way is a CE to impede with a customer's right to file a Civil Rights complaint. However, most conflicts are easily resolved by using appropriate tools. Conflict resolution consists of very useful tools to assist with the solution of complaints. The Conflict Resolution Network, found online at www.crnhq.org, identifies skills used in successful conflict resolution. These skills include:

1. Using a win/win approach is about changing the conflict from an adversarial attack and defense, to cooperation. It is this powerful shift of attitude that alters the course of communication.
2. Using a creative response is about turning problems into possibilities. It is about consciously choosing to see what can be done, rather than focusing on the perceived problem. It is affirming that you will choose to extract the best from the situation.
3. Demonstrating empathy is about rapport and openness between people. When it is absent, people are less likely to consider needs and feelings. The best way to build empathy is to help the others feel that they are understood. That means being an active listener.
4. When employing appropriate assertiveness you should be able to state your case without arousing the defenses of the other person. The secret of success lies in saying how it is for you

rather than what they should or shouldn't do. "the way I see it...", attached to your assertive statement, helps. A skilled "I" statement goes even further.

5. Cooperative power is being faced with a statement that has potential to create conflict, then asking open-ended questions to reframe resistance. Explore the difficulties and then re-direct discussion to focus on positive possibilities.
6. Remember that managing emotions is internal as well as external. It is vital to manage your own emotions, sticking strictly to the facts of the complaint, and not invoking negative emotional reactions from the complainant. The secret is to start by supporting their real needs without supporting their destructive beliefs, and alienating patterns of reaction.
7. A willingness to resolve the conflict is essential by both parties. Assessing each person's willingness to resolve, identifying barriers to a resolution and overcoming the barriers will continue the resolution process.

Employing some or all of these techniques should lead to effective conflict resolution. It is unlawful to treat a customer differently if they have filed a Civil Rights complaint or participated in an investigation. Retaliation is unacceptable and against the law. Should the complainant persist with their complaint, direct them to file their complaint with USDA's Office of Civil Rights at:

U.S. Department of Agriculture
Director, Office of Adjudication
1400 Independence Avenue, SW
Washington, DC 20250-9410
1 (866) 632-9992
1 (800) 877-8339 Federal Relay Service
1 (800) 845-6136 Spanish Speaking Assistance

MODULE 6: ADDITIONAL IMPORTANT INFORMATION

Topic
Data Collection and Maintenance
Civil Rights Coordinators
Administrative and Site Compliance Reviews
Total Class Time

Objectives

- Participants will be able to assess appropriately their organization's compliance with Civil Rights regulations and prepare for compliance reviews.



DATA COLLECTION

USDA FNS requires data pertaining to race and ethnicity be collected and maintained by CEs. The data collected is used to determine how effectively the programs are reaching potentially eligible persons and beneficiaries, identify areas where additional outreach is needed, assist in the selection of locations for compliance reviews and complete reports as required. Some programs are also required to collect benefit level data for potentially eligible program participants and actual program participants.

Self-identification or self-reporting is the preferred method of obtaining characteristic data. Program applicants and participants should be encouraged to provide the information by explaining the use of the statistical data. All personal information collected from program applicants and participants is confidential and should be safe guarded appropriately.

CIVIL RIGHTS COORDINATORS

Entities with fifteen or more employees, who participate in appropriate USDA FNS programs, must designate one or more persons to coordinate compliance with Title VI, Title IX and Section 504 regulations. To see if your entity participates in one of the appropriate programs, please refer to your TDA program handbook.

ADMINISTRATIVE AND SITE COMPLIANCE REVIEWS

TDA determines entity compliance with civil rights regulations prior to application approval and during administrative and monitoring reviews. Reviews are also conducted on an ongoing basis for all USDA FNS programs. Special reviews are conducted when an issue has been identified. During reviews, items are asked such as:

- Do potentially eligible persons and households have an equal opportunity to participate in the program?
- Is the “And Justice for All” poster prominently displayed at each site as required?
- Is the appropriate nondiscrimination statement included as required on printed materials, media releases and on Web sites?
- Do graphic materials reflect inclusiveness based on race, color, national origin, sex, age and disability?

- Is program information being made available to potentially eligible persons, program applicants and participants?
- Is the CE providing program information to a variety of organizations within the community that may assist the local agency in reaching potentially eligible populations?
- Is applicant and participant racial and ethnic data being collected and maintained on file as required?
- Are civil rights complaints being handled in accordance with procedures outlined as per regulations, policies and guidelines?
- Has Civil Rights training been conducted as required for all staff, volunteers, etc.?
- Are standard policies and procedures adhered to without regard to protected basis?
- Is there equal access, i.e., website, social media, print materials, distribution locations, etc., to the program?

If noncompliance is determined during a review, a corrective action plan will be developed including a timeframe to allow the CE to bring their operation into compliance. If the CE is unable to bring their operation into compliance, the CE will be treated as with any other instance of noncompliance. Review your program handbook for additional information regarding program noncompliance.

You understand and acknowledge that:

- the training you have completed does not cover the entire scope of the program; and that
- you are responsible for knowing and understanding all handbooks, manuals, alerts, notices and guidance, as well as any other forms of communication that provide further guidance, clarification or instruction on operating the program.



3E'S OF HEALTHY LIVING — EDUCATION, EXERCISE AND EATING RIGHT

The U.S Department of Agriculture prohibits discrimination against its customers, employees, and applicants for employment on the bases of race, color, national origin, age, disability, sex, gender identity, religion, reprisal, and where applicable, political beliefs, marital status, familial or parental status, sexual orientation, or all or part of an individual's income is derived from any public assistance program, or protected genetic information in employment or in any program or activity conducted or funded by the Department. (Not all prohibited bases will apply to all programs and/or employment activities.)

If you wish to file a Civil Rights program complaint of discrimination, complete the [USDA Program Discrimination Complaint Form](http://www.ascr.usda.gov/complaint_filing_cust.html), found online at http://www.ascr.usda.gov/complaint_filing_cust.html, or at any USDA office, or call (866) 632-9992 to request the form. You may also write a letter containing all of the information requested in the form. Send your completed complaint form or letter to us by mail at U.S.

Department of Agriculture, Director, Office of Adjudication, 1400 Independence Avenue, S.W., Washington, D.C. 20250-9410, by fax (202) 690-7442 or email at program.intake@usda.gov.

Individuals who are deaf, hard of hearing or have speech disabilities may contact USDA through the Federal Relay Service at (800) 877-8339; or (800) 845-6136 (Spanish).

USDA is an equal opportunity provider and employer.